

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

RANDOLPH W. KEUCH	:	
Plaintiff,	:	CIVIL ACTION
v.	:	
TEVA PHARMACEUTICALS USA, INC.,	:	CASE NO. 2:19-CV-05488 (JMG)
And TEVA PHARMACEUTICAL	:	
INDUSTRIES, Ltd.,	:	
Defendants.	:	

**UNCONTESTED MOTION FOR LEAVE TO FILE THE REQUIRED
JOINT APPENDIX TO THE MOTION FOR SUMMARY JUDGEMENT
AT THE CONCLUSION OF ALL BRIEFING**

Recognizing the Court's Policies and Procedures requiring the submission of a Joint Appendix in conjunction with Defendants' filing of their Motion for Summary Judgment, Plaintiff files this uncontested Motion requesting leave for the parties to file a comprehensive, fully indexed Joint Appendix at the conclusion of all briefing on Defendants' Motion. In support thereof, Plaintiff avers as follows:

1. In preparation for the filing of their Motion for Summary Judgment, the TEVA Defendants forwarded to Plaintiff's counsel the contemplated contents of the intended Appendix to be submitted in support of their Motion which consists of more than three hundred (300) pages.
2. Counsel for the parties promptly conferred regarding Plaintiff's supplement to that Appendix in accordance with the Court's published procedures.
3. Because Plaintiff is not presently aware of the precise grounds that will be presented by the Defendants to support of their Motion for Summary Judgment and cannot determine the materials that he might require to support his opposition to Defendants' Motion, the parties respectfully request to have the required paginated, indexed and tabbed Joint Appendix fully completed and filed at the time of final briefing.

WHEREFORE, it is respectfully requested that the mandated Joint Appendix to the briefs filed by all parties be filed in conjunction with the final submission of all briefing related to the Motion for Summary Judgment.

SPECTOR GADON ROSEN VINCI P.C.

By: /s/ Alan Epstein

Alan B. Epstein, Esquire (Pa. I.D. No. 2346)
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Counsel for Plaintiff

Dated: June 20, 2022

LOCAL RULE 7.1 (b) CERTIFICATION

I, Alan B. Epstein, Esquire, certify that the parties have fully conferred regarding the request for relief contained herein, and based upon the agreement of its content by all counsel file this Motion as uncontested.

/s/ Alan B. Epstein

Alan B. Epstein

Date: June 20, 2022

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INDUSTRIES, Ltd.,	:	
Defendants.	:	

ORDER

Upon review of the uncontested Motion for Leave to file the Joint Appendix to Defendants' Motion for Summary Judgment and the anticipated response thereto filed by the Plaintiff, it is hereby

ORDERED that the uncontested Motion filed by the Plaintiff is **GRANTED** and the mandated Joint Appendix to Defendants' Motion for Summary Judgment shall be filed at the time of the final briefing on the Motion by the parties.

BY THE COURT:

John M. Gallagher, J

CERTIFICATE OF SERVICE

I, Alan B. Epstein, hereby certify that on this date, the foregoing Uncontested Motion of Defendants for Leave to file the required Joint Appendix at the conclusion of the briefing by the parties relating to Defendants' Motion for Summary Judgement and the Proposed Order were filed electronically and were transmitted to all counsel listed below *via* the Court's ECF system and email.

Larry J. Rappaport, Esquire
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/s/ Alan B. Epstein

Alan B. Epstein

Date: June 20, 2022